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POLLUTION CONTROL BOARD

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DATE: December 6, 1976

Patrick O. Bovle
Suite 250
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707 Berkshire Avenue
East Alton, Illinois 62024

PCB76-213

OLIN CORPORATION

v.

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

F. D. Altekruze
Technical Systems Operation
Engineering & Development
Olin Corporation, P.O. Drawer G
Marion, Illinois 62959

Enclosed please find a certified copy of the OPINION AND ORDER
of the Board adopted on December 2, 1976 in the above captioned matter

Very truly yours,

Christan L. Moffett
Christan L. Moffett
Clerk of the Board

Copies also to: Mr. Jeffery R. Diver, Deputy Director, Illinois EPA (6)
Mr. Richard W. Cosby, Chief, Environmental Control Division

ILLINOIS POLLUTION CONTROL BOARD
December 16, 1976

OLIN CORPORATION,)	
a Virginia Corporation,)	
)	
Petitioner,)	
)	
)	
v.)	PCB 76-213
)	
)	
ENVIRONMENTAL PROTECTION AGENCY,)	
)	
Respondent.)	

OPINION AND ORDER OF THE BOARD (by Mr. Goodman):

On September 16, 1976 Olin Corporation (Olin) filed a Petition before the Board requesting extension of variance from certain Air Pollution Control Regulations for its pyrotechnic destructor incinerator (destructor) and retort destructor incinerator (retort) located in Williamson County near Marion, Illinois. The Illinois Environmental Protection Agency (Agency) filed its recommendation in this matter on November 8, 1976. No hearing was held, and no public comment has been received.

Olin requests a five year extension of a variance granted in PCB 75-333 which expires December 5, 1976. The relief requested is from Air Pollution Control Regulations, Chapter 2, Rules 104, 203(e), and 206(b). Both the destructor and the retort are utilized in the disposal of explosive wastes and are vented to the same stack and control equipment. The destructor is used to destroy loose explosive wastes and the retort is designed for the disposal of fuses, primers and explosive projectiles from intermediate caliber ammunition. The variance sought is for the operation of both incinerators.

The Agency, in its Recommendation, indicates that, due to the unusually high amount of secondary air required in this type of incineration, the existing emission standards may not be well suited

for application to the burning of explosive wastes. The Agency also believes that the possibility that Olin will violate the ambient air quality in the area during the proposed variance is minimal and proposes that the Board grant variance under certain conditions.

The Board finds Olin has continued to act in good faith in trying to solve its waste disposal problem. In addition, the equipment used by Olin represents the state of the art for elimination of highly explosive wastes and, therefore, denial of a variance at this point in time would place an unreasonable and arbitrary hardship on Olin. The Board will, therefore, grant Olin a variance subject to certain conditions, including the possibility that Olin may submit a petition for rule change prior to the termination of this variance.

This Opinion constitutes the findings of fact and conclusions of law of the Board in this matter.

ORDER

It is the Order of the Pollution Control Board that Olin Corporation be granted variance from Rules 203(e), 206(b) and 104 of Chapter 2 of the Pollution Control Board Regulations for its pyrotechnic destructor incinerator and its retort destructor incinerator located in Williamson County from December 6, 1976 until December 6, 1978, subject to the following conditions:

1. This variance shall terminate upon the adoption by the Board of any rule change pursuant to any proceeding concerning Rules 203(e), 206(b) and 104 of Chapter 2 of the Pollution Control Board Regulations.
2. Olin Corporation shall make application for an operating permit from the Agency for the subject incinerators within 45 days of the date of this Order.
3. Olin Corporation shall not operate its pyrotechnic destructor at a rate exceeding 400 pounds of scrap per hour in any one hour, nor its destructor retort incinerator at a rate of more than 500 pounds per hour.

4. Olin Corporation shall not operate the pyrotechnic destructor for more than twenty hours in any one week nor operate the destructor retort more than two hours in any one week.

5. Olin Corporation shall operate the incinerators in a manner such that particulate and carbon monoxide emissions do not exceed current levels produced.

6. Olin Corporation shall continue its present program of explosive waste incinerator development.

7. Within 30 days of the adoption of this Order, Petitioner, Olin Corporation, shall execute and forward to the Illinois Environmental Protection Agency, Division of Air Pollution Control, 2200 Churchill Road, Springfield, Illinois 62706, a Certification of Acceptance and agreement to be bound to all terms and conditions of this Order. The form of said certification shall be as follows:

CERTIFICATION


I (We), _____ having read and fully understanding the Order of the Illinois Pollution Control Board in PCB 76-213 hereby accept said Order and agree to be bound by all of the terms and conditions thereof.

SIGNED _____

TITLE _____

DATE _____

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify the above Opinion and Order were adopted on the 2nd day of December, 1976 by a vote of 4-0.


Christan L. Moffett, Clerk
Illinois Pollution Control Board

217/782-2113

February 22, 1977

Permit Expiration Date:
December 8, 1978

OLIN CORPORATION
P. O. Drawer "G"
Marion, Illinois 62959

Attention: Mr. R. D. Altekruze

Reference

Application No.	- O 6 12 0086
I. D. No.	- 199 862 AAB 76-213B
Received	- December 30, 1976
Operation of	- Destructor-Retort
Location	- Rural Williamson County
	Marion, Illinois
County	- Williamson

Gentlemen:

Permit is hereby granted to operate the above-referenced equipment.

This permit is subject to the following conditions:

1. Standard conditions attached hereto and incorporated herein by reference.

Very truly yours,

Keith J. Conklin, P.E.
Manager, Permit Section
Division of Air Pollution Control

AMT:dw

4
Williamson & P.D.



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

APPLICATION FOR A PERMIT (2) <input type="checkbox"/> CONSTRUCT <input checked="" type="checkbox"/> OPERATE		FOR AGENCY USE ONLY I. D. NO. <u>199862 AAB</u> PERMIT NO. <u>06120086</u> DATE <u>12-30-76</u>	
NAME OF EQUIPMENT TO BE CONSTRUCTED OR OPERATED <u>Destructor-Retort</u> (3)			

1a. NAME OF OWNER: <u>Olin Corporation</u>		2a. NAME OF OPERATOR: <u>Olin Corporation</u>	
1b. STREET ADDRESS OF OWNER: <u>P.O. Drawer G</u>		2b. STREET ADDRESS OF OPERATOR: <u>P.O. Drawer G</u>	
1c. CITY OF OWNER: <u>Marion</u>		2c. CITY OF OPERATOR: <u>Marion</u>	
1d. STATE OF OWNER: <u>Illinois</u>	1e. ZIP CODE: <u>62959</u>	2d. STATE OF OPERATOR: <u>Illinois</u>	2e. ZIP CODE: <u>62959</u>

3a. NAME OF CORPORATE DIVISION OR PLANT: <u>Technical Systems Operation</u>		3b. STREET ADDRESS OF EMISSION SOURCE: <u>Rural Williamson County</u>	
3c. CITY OF EMISSION SOURCE: <u>Marion</u>	3d. LOCATED WITHIN CITY LIMITS: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	3e. TOWNSHIP: <u>-</u>	3f. COUNTY: <u>Williamson</u>
		3g. ZIP CODE: <u>62959</u>	

4. ALL CORRESPONDENCE TO: (NAME OF INDIVIDUAL) <u>R. D. Altekruse</u>	5. TELEPHONE NUMBER FOR AGENCY TO CALL: <u>618/985-3721</u>
6. ADDRESS FOR CORRESPONDENCE: (CHECK ONLY ONE) <input checked="" type="checkbox"/> OWNER <input type="checkbox"/> OPERATOR <input type="checkbox"/> EMISSION SOURCE	7. YOUR ID NUMBER FOR THIS APPLICATION: (C) <u>76-213B</u>

3. THE UNDERSIGNED HEREBY MAKES APPLICATION FOR A PERMIT AND CERTIFIES THAT THE STATEMENTS CONTAINED HEREIN ARE TRUE AND CORRECT, AND FURTHER CERTIFIES THAT ALL PREVIOUSLY SUBMITTED INFORMATION REFERENCED IN THIS APPLICATION REMAINS TRUE, CORRECT AND CURRENT. BY AFFIXING HIS SIGNATURE HERETO HE FURTHER CERTIFIES THAT HE IS AUTHORIZED TO EXECUTE THIS APPLICATION.

AUTHORIZED SIGNATURE(S): (D) RECEIVED

BY Paul C. Weisman DATE 12/16/76
SIGNATURE DATE
TYPED OR PRINTED NAME OF SIGNER Paul C. Weisman
Vice President, Manufacturing
TITLE OF SIGNER Winchester Group

(A) THIS FORM IS TO PROVIDE THE AGENCY WITH GENERAL INFORMATION ABOUT THE EQUIPMENT TO BE CONSTRUCTED OR OPERATED. THIS FORM MAY ONLY BE USED TO REQUEST ONE TYPE OF PERMIT - CONSTRUCTION OR OPERATION - AND NOT BOTH.

(B) CLEARLY IDENTIFY THE GENERIC NAME OF THE EQUIPMENT TO BE CONSTRUCTED OR OPERATED. SUCH IDENTIFICATION WILL APPEAR ON THE PERMIT WHICH MAY BE ISSUED PURSUANT TO THIS APPLICATION. THIS FORM MUST BE ACCOMPANIED BY THE APPLICABLE AGENDA.

(C) PROVIDE A NUMBER IN ITEM 7 ABOVE WHICH YOU WOULD LIKE THE AGENCY TO USE FOR IDENTIFICATION OF YOUR EQUIPMENT. YOUR IDENTIFICATION NUMBER WILL BE REFERENCED IN ALL CORRESPONDENCE, RELATIVE TO THIS APPLICATION, FROM THIS AGENCY. YOUR IDENTIFICATION NUMBER MUST NOT EXCEED TEN (10) CHARACTERS.

(D) THIS APPLICATION MUST BE SIGNED IN ACCORDANCE WITH PCB REGS., CHAPTER 2, PART 1, RULE 103(a)(4) OR 103(b)(5) WHICH STATES: ALL APPLICATIONS AND SUPPLEMENTS THERETO SHALL BE SIGNED BY THE OWNER AND OPERATOR OF THE EMISSION SOURCE OR AIR POLLUTION CONTROL EQUIPMENT, OR THEIR AUTHORIZED AGENT, AND SHALL BE ACCOMPANIED BY EVIDENCE OF AUTHORITY TO SIGN THE APPLICATION."

IF THE OWNER OR OPERATOR IS A CORPORATION, SUCH CORPORATION MUST HAVE ON FILE WITH THE AGENCY A CERTIFIED COPY OF A RESOLUTION OF THE CORPORATION'S BOARD OF DIRECTORS AUTHORIZING THE PERSONS SIGNING THIS APPLICATION TO CAUSE OR ALLOW THE CONSTRUCTION OR OPERATION OF THE EQUIPMENT TO BE COVERED BY THE PERMIT.

OPERATIONAL INFORMATION

11. AVERAGE OPERATION TIME OF INCINERATOR: 2 HRS/DAY 1 DAYS/WEEK 52 WKS/YEAR

12. PERCENT OF ANNUAL THROUGHPUT: DEC/FEB 25 % MAR/MAY 25 % JUN/AUG 25 % SEP/OCT 25 %

SPECIAL NOTES

- 13a. FOR INDUSTRIAL WASTES, COMPLETE COMPONENT AND/OR CHEMICAL DESCRIPTION INCLUDING SULFUR, CHLORIDE, ASH, AND MOISTURE CONTENT, MUST BE GIVEN IN AN EXHIBIT ATTACHED TO THIS APPLICATION. See Addendum A Below
- b. THE AGENCY MUST HAVE ON FILE PROOF THAT THE MAKE AND MODEL INCINERATOR DESCRIBED HEREIN WILL MEET THE REQUIREMENTS OF RULES 203(a) and 205(b) WHEN BURNING THE WASTE, BOTH TYPE AND RATE, DESCRIBED HEREIN.
- c. GAS CLEANING DEVICES (IF "YES", COMPLETE APC-260, ENTITLED "DATA AND INFORMATION - AIR POLLUTION CONTROL EQUIPMENT")
☒ YES ☐ NO
- d. IF LOCATED IN COOK COUNTY, SUBMIT ADDITIONAL PERMIT APPLICATION PLUS COOK COUNTY CONSTRUCTION PERMIT APPLICATION.

Addendum A

Examples of Typical Wastes to be Incinerated are:

1. 20mm Projectiles

Steel	85.0%
RDX Explosive	9.9%
Aluminum Powder	4.9%
Graphite	0.2%

2. Fused Projectiles

Steel	80.4%
RDX Explosive	8.1%
Aluminum Powder	3.7%
Graphite	0.2%
Calcium Resinate	0.1%
Lead Styphnate	.3%
Lead Azide	1.4%
HMX Explosive	5.8%